

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 23-CV-22629-RAR

MANUEL JESUS ALONSO,

*Plaintiff,*

vs.

SUNBELT RENTALS, INC.,

*Defendant.*

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**UNOPPOSED MOTION FOR LEAVE TO COMPLY WITH ORDER BY MEDIATION**

Defendant Sunbelt Rentals, Inc. (“Defendant”) moves for leave to comply with the Court’s January 10, 2024 Order by conducting mediation on February 1, 2024, and states:

1. The Parties are currently scheduled to mediate this case on February 1, 2024 with Carlos J. Burruezo, Esq., whose business address is 5550 W. Executive Drive, Suite 250, Tampa, Florida 33609 (carlos@burruezolaw.com). ECF Nos. 14; 15.

2. On January 10, 2024, the Court issued an Order requiring the parties to conduct an informal settlement conference of at least two (2) hours by January 31, 2024. ECF No. 20.

3. Defendant requests, without opposition, leave to Comply with the Court’s Order by conducting the scheduled mediation on February 1, 2024.

4. There is good cause to grant the requested relief for several reasons.

5. First, throughout this litigation, the Parties have conferred extensively and discussed settlement. These settlement discussions, in total, far exceed the two (2) hours this Court is requiring from the Parties.

6. Second, while the Parties have made some progress toward settlement, it is apparent the Parties view the facts very differently, and that the assistance of third-party neutral is needed

for there to be a chance of settlement.

7. Third, and as stated above, the Parties are already scheduled to mediate with Mr. Burruezo *one day* after the deadline to conduct an informal settlement conference per the Court's Order (i.e., on February 1, 2024). The Parties thoughtfully chose Mr. Burruezo because of their trust in him, his abilities, and because he speaks Spanish, something that will be useful in communicating and connecting with the Plaintiff, who is not fluent in English.

8. Finally, complying with the Order by conducting the mediation as scheduled would conserve the Parties' resources and eliminate potential duplication of efforts.

Thus, for the reasons outlined above, the Parties respectfully request that the Court grant leave to comply with the Order by conducting the February 1, 2024, mediation as scheduled, and grant such other relief as is just and proper.

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(3)**

On January 17, 2024, counsel for Defendant and counsel for Plaintiff conferred about the relief requested herein and Plaintiff informed he does not oppose the relief sought herein..

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**Date:** January 19, 2024.

Respectfully Submitted,

/s/ Rocio Blanco Garcia

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